

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

<hr/>		)	
NATIONAL IMMIGRATION PROJECT OF		)	
THE NATIONAL LAWYERS GUILD, et al		)	No. 18 Civ. 659 (RA)
		)	
Plaintiffs,		)	<b>NOTICE OF CROSS MOTION</b>
		)	
v.		)	
		)	
UNITED STATES DEPARTMENT OF		)	
HOMELAND SECURITY, et al		)	
		)	
Defendants.		)	
<hr/>		)	

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Statement Pursuant to Rule 56.1, and the accompanying exhibits, plaintiffs National Immigration Project of The National Lawyers Guild and Margaret Satterthwaite, by their attorneys hereby move this Court for an order granting partial summary judgment in favor of plaintiffs, pursuant to Federal Rule of Civil Procedure 56, and for such other relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the briefing schedule approved by the Court on April 6, 2018, Defendants must serve and file their opposition to Plaintiffs' motion by May 28, 2018.

Dated: May 18, 2018  
New York, New York

Respectfully Submitted,

By: /s/ Jessica Rofé

Nancy Morawetz  
Jessica Rofé  
Fatima Carrillo Moran, Legal Intern  
Nora Searle, Legal Intern  
Kevin Siegel, Legal Intern  
WASHINGTON SQUARE LEGAL  
SERVICES, INC.  
245 Sullivan Street, 5th Floor  
New York, NY 10012  
(212) 998-6430  
[nancy.morawetz@nyu.edu](mailto:nancy.morawetz@nyu.edu)  
[jessica.rofe@nyu.edu](mailto:jessica.rofe@nyu.edu)  
*Attorneys for Plaintiffs*

TO: Caleb Hayes-Deats  
Assistant United States Attorney  
86 Chambers Street, Third Floor  
New York, New York 10007  
Attorney for Defendant